

13.10.12



February 14, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

BUNKER HILL PARTICIPATING POTENTIALLY RESPONSIBLE PARTIES:

Gulf Resources & Chemical Corporation
ASARCO, Inc.
Coeur d'Alene Mines Corporation/Callahan Mining Corporation
Hecla Mining Company
Stauffer Chemical Company
Sunshine Precious Metals
Union Pacific Railroad

Re: **Bunker Hill Superfund Site;**
December 20, 1991, CERCLA Section 104(e) Request for
Information

The Environmental Protection Agency ("EPA") recently received and reviewed your individual responses to the above-referenced request for financial information. As you may be aware, EPA desires to meet with the Bunker Hill Participating PRPs to further discuss your collective and individual ability to pay for the costs to cleanup releases of hazardous substances at the Bunker Hill Superfund Site.

In particular, EPA and the State of Idaho desire the participating PRPs to provide suitable financial assurances for the performance of future cleanup activities at the Bunker Hill site. Both EPA and Idaho have serious concerns regarding the participating PRPs' financial ability and willingness to pay the governments' outstanding past costs and to implement future remedial action at the site. Moreover, you have requested that EPA postpone issuing special notice letters for the residential soils Record of Decision ("ROD") issued in August 1991, in order to negotiate one consent decree for the entire site after completion of the non-populated areas ROD later this summer.

EPA prefers not to single out any individual PRPs, but rather seeks to have the participating PRPs provide joint, rather than individual, financial assurances, such as a bond, letter of credit, or other binding agreement to ensure the performance of or payment for both the populated and non-populated areas remedial actions. As you know, the residential soils ROD for the Bunker Hill populated areas is estimated to cost \$40 million to implement, while non-populated areas cleanup is, according to the cost figures contained in your



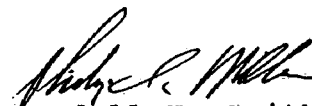
most recent draft of the Feasibility Study, estimated to cost between \$57 and \$90 million to implement. In addition, EPA has incurred over \$15 million in past agency costs related to the Bunker Hill Superfund Site investigation to date.

EPA appreciates the cooperation which the participating PRPs have shown during the last year to expeditiously complete the Feasibility Study and to undertake cleanup actions pursuant to the 1991 Administrative Order on Consent. We also recognize the commitment recently made to EPA to continue to perform cleanup work in residential yards and other areas of the site this summer. However, I am sure you understand that in order for EPA to continue to delay enforcement actions with respect to completed response activities at the site, actual financial commitments and legally enforceable assurances are necessary to ensure protection of the public health and environment.

Accordingly, you are invited to a meeting on February 27, 1992, with representatives of EPA and the State of Idaho to discuss the details of creating a financial assurance mechanism for the Bunker Hill site. I understand that many of you have already been contacted by Allan Bakalian and indicated that you are available to meet at 1 p.m. at the EPA Region 10 Office of Regional Counsel conference room (15th Floor), on Thursday, February 27.

Thank you again for your attention to this matter. Should you have any questions, please contact either John Meyer, Project Manager, at (206) 553-1271, or Allan Bakalian, Assistant Regional Counsel, at (206) 553-1789.

Sincerely,


For Randall F. Smith, Director
Hazardous Waste Division

cc: Chuck Moss
Curt Fransen
Peter Mounsey
Ray Givens
Barry Stein
Larry Mehl
David Weinberg
Jim Woods
Mike Thorp
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Jim Woods
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John Simko
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Bill Boyd
Nancy A. Roberts
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Bill Kissinger
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